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10 Attorneys for Plaintiff

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13  
14 **CANDY TORRES,**

15 **Plaintiff,**  
16 **vs.**

17 **ALLAN ROTHSTEIN, et al.**

18 **Defendants.**  
19

**No. 2:19-cv-00594-APG-EJY**

**JOINT APPLICATION AND  
STIPULATION TO CONTINUE  
ALL PROCEEDINGS UNTIL  
JUNE 21, 2024**

20 The parties in this case, together with Drake Rothstein as Trustee of the  
21 Mexican Gold & Oil Exploration Trust dated November 7, 2012, hereby stipulate  
22 and request to continue all proceedings until June 21, 2024. There is good cause for  
23 the Court to grant this request:

24 As the Court knows, Defendant Allan Rothstein breached the terms of a  
25 settlement agreement (ECF 261-1) that he entered into in May 2023, with Plaintiff  
26 Candy Torres. The settlement terms, if completed, would have obviated the need to  
27 finish the trial.

28 On January 11, 2024, plaintiff filed a motion for leave to file a second

1 amended complaint adding a new defendant, Mark H. Rothstein, Trustee of the  
 2 Mexican Gold & Oil Exploration Trust dated November 7, 2012. (ECF 267.) After  
 3 the motion was filed, Drake Rothstein and Plaintiff Torres engaged in discussions  
 4 to resolve the motion without the need for adjudication. The parties filed, and the  
 5 Court granted, several extensions of time for Drake Rothstein to file a brief in  
 6 opposition to the motion as the parties negotiated. (See ECF 272 - 282.)

7 On April 16, 2024, Candy Torres and Drake Rothstein entered into a  
 8 settlement agreement. The terms of the settlement will not be executed in full until  
 9 late May or early June 2024. If the terms are fully executed on or before June 14,  
 10 2024, no further proceedings will be necessary and the parties will file a request for  
 11 dismissal of the action.

12 Accordingly, the parties respectfully apply for and stipulate to a continuance  
 13 of all proceedings until June 21, 2024. The parties will notify the Court and file a  
 14 request for dismissal if the settlement terms are fully carried out before that date.

15  
 16 \* \* \*

17 Dated: April 29, 2024

18 Respectfully submitted,

19  
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Exploration Trust, Drake Rothstein as  
Trustee

No. 2:19-cv-00594-APG-EJY

ORDER GRANTING THE JOINT APPLICATION AND STIPULATION TO  
CONTINUE ALL PROCEEDINGS UNTIL JUNE 21, 2024

IT IS SO ORDERED:

Dated: April 30, 2024



ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE